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And Raymond Chenoweth*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

FRANK COHN, Individually and on behalf on a  
class of all similarly situated persons,

Plaintiff,

vs.

RITZ TRANSPORTATION, INC., AWG  
AMBASSADOR, LLC, ALAN WAXLER, and  
RAYMOND CHENOWETH,

Defendants.

Case No.: 2:11-CV-1832-JCM-RJJ

**STIPULATION AND ORDER FOR  
STAY ALL PROCEEDINGS  
(Second Request)**

Plaintiff, Frank Cohn, and defendants, Ritz Transportation, Inc., AWG Ambassador, LLC, Alan Waxler, and Raymond Chenoweth, through their respective counsel, hereby submit this stipulation and request to stay all proceedings in this matter until July 1, 2013. Such stipulation is based upon the following:

1. The parties have engaged in a thorough exchange of relevant information.
2. Such exchange of information led the parties to a point in which they believe they could engage in meaningful settlement discussions, and have done so.
3. This Court entered its Order on or about March 6, 2013 staying these proceedings to allow the parties to engage in settlement discussions.

4. During the stay, Plaintiffs analyzed all relevant payroll data and have provided such analysis along with a demand to defendants.
5. Defendants are in the process of evaluating Plaintiffs payroll analysis and demand in order to develop a counter offer to such demand.
6. The parties wish to continue these settlement discussions and are optimistic that such discussions will prove to be successful.
7. In light of the foregoing, the parties request the Court stay all proceedings in this matter until July 1, 2013. This is a 60 day stay and the parties believe that such time is warranted to formulate a full resolution of all claims in this case.
8. This is the parties' second request for a stay, is made in good faith, and not made for purposes of delay.

Submitted this 1<sup>st</sup> day of May, 2013.

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**IT IS SO ORDERED:**

Dated May 2, 2013

  
UNITED STATES DISTRICT/  
MAGISTRATE JUDGE